

EXHIBIT 2

In The Matter Of:

*CHAE BROTHERS, LIMITED LIABILITY COMPANY, ET AL. v.
MAYOR AND CITY COUNCIL OF BALTIMORE, ET AL.*

STEPHANIE RAWLINGS-BLAKE

January 29, 2021

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

CHAE BROTHERS LIMITED LIABILITY)	
COMPANY, et al.,)	
)	
Plaintiffs)	Civil Action No.:
)	
VS.)	1:17-CV-01657-SAG
)	
MAYOR & CITY COUNCIL OF BALTIMORE)	
et al.,)	
)	
Defendants)	Pages 1-244

REMOTE DEPOSITION OF STEPHANIE RAWLINGS-BLAKE

DATE: JANUARY 29, 2021 (FRIDAY)

TIME: 10:04 A.M.

LOCATION: Baltimore, MD

REPORTER: SHERRY L. BROOKS, CLR
Certified LiveNote Reporter
State of Maryland Notary Public

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1 Q. Okay. Now these discussions that you had
2 with your senior leadership team upon Freddie Gray's
3 passing on April 19th, 2015, what do you recall being
4 discussed?

5 A. I don't remember specific conversations.
6 I remember us trying to do a lot of work -- to do
7 outreach with faith leaders, community leaders,
8 activists, trying to ensure that people understood
9 what we were doing with respect to the investigation,
10 to make sure that people knew that -- you know, that
11 we weren't sweeping this under the rug; that we were
12 concerned about the circumstances; that we were
13 taking it seriously, reminding people about the
14 ongoing work that we've done around police reform.

15 I think that there was some -- you know,
16 in light of -- I think the most recent one might have
17 been Ferguson. There were so many red flags that I
18 saw, that as a group we saw, in the way that their
19 protests were handled. There was some conversations
20 -- I know there were some conversations around that,
21 you know, being mindful of the ways in which we
22 believed the protests there escalated.

23 Q. Okay. When you refer to "red flags" and
24 reasons why things may have escalated in Ferguson, to
25 what are you referring?

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1 led to concerns that that may have escalated the
2 situation in Ferguson.

3 While you're having these discussions with
4 your senior leadership team, what was decided?

5 A. I don't -- I don't know if there was a
6 decision made. It was a concern that was raised.

7 Q. Okay. And what did you decide to do as a
8 result of that concern being raised?

9 A. Say that again.

10 Q. What did you do as a result of that
11 concern being raised?

12 A. I don't know if it's an action that I did
13 specifically as a result of that concern. It was
14 more of an understanding of the need to be smarter
15 about the way that we deployed our public safety
16 resources in efforts to strike the right -- right
17 balance so we would not have the escalation, you
18 know, the weeks and weeks of ongoing -- you know,
19 there was -- my recollection, there was weeks and
20 weeks of not just protests, but violence and property
21 destruction and things like that in Ferguson.

22 Q. Okay. So how did you think that public
23 safety resources should be deployed differently here
24 in Baltimore City than had been the case in Ferguson?

25 A. I believed that the immediate introduction

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1 of military equipment as evidenced by what has --
2 what happened in Ferguson would be a -- the immediate
3 introduction of that type of force would lead to the
4 ongoing escalation.

5 When I say that, you know, I didn't want
6 to have weeks and weeks and weeks of protests because
7 of -- well, not just protests. Protests weren't the
8 issue. I didn't want to have weeks and weeks of
9 violent interaction and property destruction, so we
10 were very -- I was very concerned about the immediate
11 introduction of that escalated military response.

12 Q. Okay. Aside -- you referred to military
13 equipment. Aside from the actual equipment, was
14 there any other concerns about how -- what type of
15 response may escalate things?

16 A. Yes.

17 Q. What other -- what other things?

18 A. I don't remember specifically. But
19 generally speaking, you know, what type of police
20 resources we would use, what type of support we would
21 need from the state and/or other jurisdictions.

22 Q. Okay. So in terms of the type of police
23 resources, what types of police resources did you
24 believe should be deployed here different than what
25 had been deployed in Ferguson so as to not escalate

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1 guess, a recipe, the ingredients of, you know,
2 unrest, you know, all of the parts.

3 We tried to identify all of the
4 ingredients that would lead to, you know -- or could
5 lead to the type of situation that we did not want to
6 have.

7 And then we went about engaging with them
8 in efforts to share information, to learn, and to use
9 that -- to use what we learned to create a -- a
10 reasonable -- a reasoned response based on what we
11 were hearing, not just from police -- that was part
12 of the equation -- but also from the greater
13 community as well.

14 Q. And what did you believe were, I'll use
15 your term, the ingredients that you were identifying
16 that would lead to unrest that you wanted to avoid?

17 A. I think one of the things that we knew
18 would contribute or that we'd seen in the past would
19 contribute to unrest was a lack of information and a
20 lack of transparency.

21 So we worked hard to make sure that the
22 community stakeholders -- that we were in constant --
23 that we -- we tried to be -- you know, have open
24 lines of communication and to be transparent about
25 what we knew; what we didn't know, and to be clear

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1 about what our plans were, as far as, again -- you
2 know, I really prided myself on not sweeping things
3 under the rug.

4 Like, we wanted to be clear that there was
5 a level of concern and because of that concern that
6 we were taking the investigation into his death very
7 seriously and, you know, to make sure that people had
8 an understanding of that, yes, it was a tragedy.

9 And we didn't want to compound the tragedy
10 by not having a requisite amount of attention being
11 placed on finding out exactly what happened and
12 making sure that -- that -- you know, whatever
13 happened that the people could have faith in the
14 outcome of the investigation and do our part to make
15 sure that whatever happened after that investigation,
16 after that information was given to the state's
17 attorney's office, that we did our part to make sure
18 that there was a just outcome.

19 Q. And we'll get back to the investigation
20 and we'll get back to engaging with community leaders
21 and the community in a minute.

22 I want to go back, though, to your
23 testimony earlier, again, during these meetings and
24 discussions with your senior leadership team upon
25 Freddie Gray's passing on April 19th, 2015.

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1 A. Yeah. Outside of the equipment, from my
2 recollection, the police response was very aggressive
3 and confrontational and caused an escalation that
4 they could not -- that they couldn't de-escalate.

5 So, you know, in response to what they
6 believed was understandably -- in response to what
7 several members of the community believed was
8 understandable anger and frustration, the police
9 response was -- in response to police violence, the
10 response was more police violence. They responded
11 very aggressively.

12 And as a result of that, there were -- you
13 know, I can't even remember how many weeks they had
14 of -- not just -- again, not just the protests.
15 That's not what I'm talking about. I don't think
16 anybody has concerns about the protests.

17 I'm talking about the fact that because of
18 that escalation, because of the aggressive response,
19 there were weeks of violence and looting and loss of
20 life.

21 Q. Okay. So what about the police response
22 in Ferguson, outside of the military equipment, made
23 their response, in your opinion, aggressive and
24 overly confrontational?

25 A. The way that the police were deployed and,

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1 A. I am not sure.

2 Q. Okay. Does the general formatting of this
3 look familiar to you?

4 A. No.

5 Q. Okay. Did you use some sort of calendar
6 system or appointment system while you were mayor?

7 A. Yes.

8 Q. Okay. Was it like Outlook, something like
9 that?

10 A. Something like that.

11 Q. Now, you're listed as the organizer in
12 Exhibit 8, correct?

13 A. Yes.

14 Q. And it refers to you participating in a
15 business outreach conference call scheduled for April
16 24th, 2015 at 3:00 p.m., correct?

17 A. Correct.

18 Q. Do you recall engaging in such calls with
19 the business community?

20 A. Yes.

21 Q. Okay. Was it -- did this call take place
22 on April 24th at 3:00 p.m.?

23 A. I do not know -- well, I do not recall.

24 Q. Now, during these calls with the business
25 community that you did have, what do you recall being

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1 discussed?

2 A. So this would have been the day before the
3 planned protest. I know one of the things that we
4 tried to do with potential impacted businesses was to
5 share the intelligence that we knew or as much as we
6 had so that potentially -- potentially impacted
7 businesses and business owners could be prepared, as
8 well as I believe part of that conversation was
9 suggestions or advice around what preparedness looks
10 like.

11 Q. Okay. And what kind of suggestions about
12 preparedness would have been shared during this call?

13 A. During this call, this call specifically,
14 I do not know. I know that generally when we knew or
15 had reason to believe that there was a potential for
16 large -- large gatherings in some -- in some areas,
17 we would encourage business owners to close.

18 Q. Okay. Do you recall whether such a
19 suggestion was given during this call?

20 A. I cannot remember if it was during this
21 specific call, but -- yeah. I can't remember during
22 this specific call, but it would make sense if that
23 was part of the conversation because particularly the
24 downtown businesses -- and when I say -- not offices,
25 even though I think the offices -- I don't know.

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1 A. What time period?

2 Q. Let's take it from Freddie Gray's passing
3 on April the 19th leading up to April 25th.

4 A. It's hard for me to answer that question
5 because the question is -- you are relating the fact
6 that the investigation wasn't complete to the size of
7 the protest. Two independent -- two independent
8 things.

9 Q. Let me break it up then and make it clear.
10 From April 19th, 2015 to the time of
11 Freddie Gray's passing, leading up to April 25th,
12 2015, that Saturday, do you recall the protest
13 generally escalating in size?

14 A. Yes.

15 Q. And during that time, the Baltimore Police
16 Department was still investigating the circumstances
17 of Freddie Gray's passing and investigating whether
18 or not six police officers had committed any
19 wrongdoing, correct?

20 A. Correct.

21 Q. Okay. And during that time period,
22 between April 19th, 2015, and Saturday, April 25th,
23 2015, do you recall asking for and receiving regular
24 updates as to the status of that investigation?

25 A. I remember -- so I -- not -- I mean, I

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1 know -- I have a sense that I -- that I was given
2 updates. I don't recall.

3 Q. Do you recall the timing of the
4 investigations being made public or being handed over
5 to the state's attorney's office being a concern for
6 the city?

7 A. I remember there being a discussion about
8 making sure that we were as transparent as possible
9 with the public about what was -- the status, the
10 progress of the investigation on an ongoing basis.

11 Q. Was there any concern that the
12 investigation by the Baltimore Police Department was
13 taking too long?

14 A. Was there any concern by whom?

15 Q. By the city.

16 A. By who?

17 Q. By the city. You.

18 A. No.

19 Q. If I can direct your attention to 14,
20 please.

21 MR. HWANG: And if we could mark it as
22 Exhibit 14.

23 (Exhibit Number 14 was marked for
24 identification and was attached to the deposition.)

25 BY MR. HWANG:

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1 Q. It's an email produced by the city as City
2 00055110. And you're on this email chain, correct?

3 A. Yes.

4 Q. All right. Do you recall Senator Kelly?

5 A. Yes.

6 Q. And do you recall the Shock Trauma Gala
7 that's referenced in this email chain?

8 A. I'm familiar with the Shock Trauma Gala.
9 I was on their board.

10 Q. Okay. It's an annual -- is it an annual
11 event?

12 A. Yes.

13 Q. And would you say it's a pretty big event?

14 A. Yes. It's huge.

15 Q. Okay. Now, if you see here, Senator Kelly
16 reaches out to you and asks for your advice regarding
17 the Shock Trauma Gala scheduled -- he says tonight.
18 So that would have been on April 25th?

19 A. Correct.

20 Q. And you then asked -- you say that you
21 asked Kali. And I presume that means Kaliope, your
22 chief of staff?

23 A. Correct.

24 Q. So you asked her to reach out and --
25 specifically to reach out to Senator Kelly. Why did

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1 the property destruction, looting, and violence, or
2 to incite others to do so?

3 A. To make sure that they could not engage in
4 disruptive or destructive behavior, and I don't know
5 if I'm repeating myself or if this is what you're
6 getting at.

7 You know, we were very aggressively
8 monitoring the channels in which we knew people were
9 talking about protests and events.

10 And also as I said before, you know, you
11 try to attack the issue from a lot of different
12 sides, so we were trying to gather as much intel
13 about what was possible moving forward.

14 We were trying to make sure that we were
15 doing our part to influence that conversation so, you
16 know, that -- to try to prevent further disruptions.
17 And the police department -- and again, I don't know
18 if this is what you're trying -- if this is the
19 information that you're trying to glean, but we
20 weren't just seeking the intel.

21 There was -- there were efforts to make
22 sure that as the intelligence was being gathered that
23 the police department tried to put in -- worked to
24 put in place the appropriate protections and
25 response.

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1 attention to 22.

2 MR. HWANG: If we could mark that as
3 Exhibit 22, please.

4 (Exhibit Number 22 was marked for
5 identification and was attached to the deposition.)

6 BY MR. HWANG:

7 Q. It is an email produced by the city as
8 City 00052170.

9 A. One second. 22?

10 Q. Yes, 22.

11 MR. HWANG: Can I have that marked as 22?

12 BY MR. HWANG:

13 Q. Now, the third paragraph of 22 refers to a
14 mass high school purge expected at 3:00 p.m. and it
15 says tomorrow. The email was sent on Sunday, April
16 26th, so tomorrow would refer to Monday, April 27th.

17 Do you see that?

18 A. Yes.

19 Q. Do you recall there being rumors of a,
20 quote/unquote, purge on Monday, April 27th?

21 A. Yes.

22 Q. And what is -- what was your understanding
23 as to what a purge referred to?

24 A. So we knew that the purge -- the -- it was
25 referencing a movie, but the purge -- I guess it was

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1 -- from what I can remember about the movie, it was a
2 movie about -- I think it's like one day a year in
3 this city that you can do whatever -- you can do any
4 crime that you want without being punished, so that
5 is what we knew was being referenced.

6 Q. Okay. So the rumors of a purge that was
7 expected on Monday, April 27th, that would be in
8 reference to crimes being committed or there being
9 violence; is that correct?

10 A. So we didn't -- how do I say this? So
11 there was -- there were these rumors about -- just
12 one second.

13 There were rumors about a purge at a high
14 school, but understand that other than us knowing
15 that The Purge was the name of a movie, there was --
16 there had been nothing in our city prior to that, nor
17 I think anywhere else in the country that would give
18 very clear -- very clear intel on what it means when
19 high school -- high school kids -- what does it say?
20 -- yeah.

21 There was -- there was -- mass high school
22 purge, it was unclear what that even -- even meant.
23 You know, it hadn't happened in Baltimore
24 subsequently. And like I said, I don't know if it's
25 happened anywhere else.

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1 in the area in preparation for what we could -- the
2 possibilities that we could prepare for based on the
3 information we had at the time -- when they
4 responded, the young people responded to the police
5 officers by throwing cans, bottles, pieces of cement
6 and brick.

7 And it was -- it was a -- it turned -- the
8 group of kids that were engaging with the police were
9 joined, I think, unintentionally by a lot of kids
10 that became stranded at that station because the
11 state closed the MTA, all the buses and subways from
12 that location.

13 So if you were there at the time when the
14 young people decided that, you know, they were going
15 to purge, whether you wanted to be a part of it or
16 not, you -- I should say, and you depended on public
17 transportation, you were -- you were stuck in the
18 middle of it.

19 Q. Were there officers injured at that time?

20 A. Yes.

21 Q. Do you recall there being officers injured
22 on Saturday, April 25th, 2015?

23 A. Yes.

24 Q. Now, coming back to Monday, April 27th,
25 the events that you're describing at Mondawmin, it

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1 eventually spread beyond Mondawmin and to other areas
2 in Baltimore City?

3 A. Yes.

4 Q. Okay. And when it spread, what types of
5 activity happened throughout Baltimore City?

6 A. There was a -- a lot of -- I can't say
7 riots. There was a lot of looting and destruction.

8 Q. And when you say "destruction," do you
9 mean property destruction?

10 A. Property destruction, yes.

11 Q. Do you also recall there being violence?

12 A. Yes.

13 Q. Okay. And do you recall some business
14 owners being attacked physically?

15 A. I believe so, yes.

16 Q. Now, let me go back to when things started
17 at Mondawmin.

18 Do you recall where you were?

19 A. No.

20 Q. What about as things progressed and
21 escalated and spread throughout the city, do you
22 recall where you were at certain points of time or
23 how your day went as things progressed?

24 A. At some point before -- at some point
25 around the time when we started to get information

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1 to remember is is there was the melee, the
2 confrontation. Some of the police officers that were
3 located in the Mondawmin area responded to a (sic)
4 police in distress.

5 And the -- again, from what I can recall,
6 that left the officers that were there that were sort
7 of stuck there with the protestors, as well as
8 everybody else that were stuck there because the
9 state closed the transportation hub down -- they were
10 -- there weren't enough officers there.

11 And it turned into -- the young people
12 turned their attention from just, you know,
13 destruction -- I think it went from the
14 transportation hub -- I have a feeling that it went
15 across to the -- there's a 7-Eleven somewhere near
16 there. I have a -- some store, and I have a feeling
17 that it was near there.

18 And my recollection is that it moved --
19 there was some destruction in the store. And then as
20 the kids became more unruly, it turned into kids
21 deciding to break into or destroy stuff at Mondawmin.

22 And I say it didn't spread in the way that
23 it did on Saturday. Because all of this was being
24 televised and, you know, I think opportunists are
25 opportunists, what looked to happen is when the kids

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1 were, you know, being destructive, what you began to
2 see was people, not kids -- just people in cars
3 driving up. And because it was, you know, chaotic,
4 people started looting.

5 And, you know, again, I say it wasn't the
6 kids. The tapes show like just people driving up to
7 Mondawmin, you know, running in and grabbing stuff.
8 After -- after the incident, you could see that's
9 what was happening.

10 It wasn't -- you know, it wasn't people
11 stealing Pampers and formula. It was, you know,
12 high-end tennis shoes, the luxury goods that
13 Mondawmin had. You know, the people were stealing
14 it, and presumably based on what happened -- what I
15 know happened afterwards or -- that, you know, they
16 were selling it.

17 So as that was being broadcast, you know,
18 people running in and looting Mondawmin, I think I
19 also remember that other -- as the sun was going
20 down, people decided -- you know, pockets of people
21 decided throughout the city to -- to do the same
22 thing.

23 So there was this pretty discrete --
24 meaning it wasn't a place that was broadly
25 advertised. It didn't have big signs. Unless you

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1 knew it, you didn't know it. But this really, really
2 high-end luxury tennis shoe shop that was downtown,
3 again, unless you know, you don't know.

4 So, you know, that was an example of one
5 of the places that was looted. You know, people
6 basically just stole their whole inventory, and
7 different places around the city things like that
8 happened.

9 So people -- there were people who were
10 interested in having prescription drugs. You know,
11 as things descended, you know, and as things got
12 chaotic, people who wanted to take the opportunity to
13 get prescription drugs, you know, broke into, not
14 just the CVS that made the news, but, you know, small
15 pharmacies around the city.

16 And, you know, different -- it was
17 different pockets of that where you saw, you know,
18 people not necessarily -- I -- I did not interpret it
19 as them making a stand against, you know, police
20 brutality, in-custody death, injustice.

21 It seemed that unfortunately pockets of
22 people throughout the city decided to take the
23 opportunity to -- you know, for their own personal
24 gain to loot and destroy stuff.

25 Q. Do you recall how many businesses were

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1 looted or otherwise damaged?

2 A. I don't remember the total number. I just
3 remember it was a lot.

4 Q. And the geographical locations of these
5 businesses and buildings, were they pretty much
6 spread across the city?

7 A. Again, I don't know how much was spread.
8 In the sense that I think there was some violence and
9 destruction, say, like the Mondawmin area kind of
10 melee migrated into Pennsylvania and North Avenue and
11 there was destruction that spread there.

12 The other locations, I don't think people
13 were moving from one location to the next. I -- what
14 it looked like was where this high-end -- you know,
15 basically secret high-end sneaker store was, people
16 knew that it was there and, you know, the city is
17 dealing with looting and da, da, da, da.

18 You know, some people hit that spot. Some
19 people hit the drug store. You know, it wasn't -- it
20 was not a spread. It was -- it seemed to be just
21 distributed.

22 Q. I don't mean to say that it's the same
23 people kind of going throughout the city and looting
24 stores. I understand that these are different
25 pockets of people, but I get a sense of the

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1 geographical scope of where these pockets were.

2 A. It seemed to be in -- you know, the --
3 there were pockets throughout the city. I certainly
4 wouldn't say evenly distributed throughout the city.

5 Q. Now, as you get to the watch center on
6 April -- sorry -- the command center, you called it
7 -- on April 27th, 2015, you said you recalled
8 Commissioner Batts being there and your chief of
9 staff being there?

10 A. Yes.

11 Q. So you get there and what happens?

12 A. So I don't remember -- I don't remember
13 the timing, but I do remember that by the time that
14 -- I feel like by the time that I got there that it
15 was clear that we would need the resources of the
16 state.

17 And it was my understanding -- I seem to
18 recall that my public safety team and my legal team
19 were crafting the language to create our legal
20 response, I guess, is the best thing -- you know, the
21 -- what -- what the -- the state of the -- the
22 official response would be, what the -- what the
23 state of emergency would look like in response to
24 what happened.

25 Q. Okay. Now, when you said state resources,

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1 Q. Do you recall Daniel Sparaco?

2 A. Yes.

3 Q. Okay. And I believe you testified earlier
4 that Khalil Zaied, Z-A-I-E-D, was a member of your
5 leadership team, senior leadership team?

6 A. Yes.

7 Q. Now, in this email, Mr. Sparaco tells Mr.
8 Zaied -- the heading says, "Mayor going to BPD." And
9 then it states: "She needs to discuss the idea of
10 bringing in the National Guard with Batts. He wants
11 it. I think he's overwhelmed by the situation."

12 So when you got to the watch center, do
13 you recall Commissioner Batts coming to you and
14 saying you need to call in the National Guard?

15 A. I do not remember specifically him saying
16 that. My recollection -- and, you know, this is just
17 based on what I can recall. And, you know, again, if
18 you have other documents that can help me.

19 I had a sense of by this time, 6:30, that
20 the state of emergency, the back-and-forth with the
21 state, as far as what resources would be made
22 available -- that conversation had already started.

23 So I don't -- I don't remember it being --
24 I don't remember thinking to myself, you know, I
25 wonder if Batts wants the National Guard -- do you

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1 sister.

2 Do you remember that?

3 A. Yep, and I referenced it in my previous
4 testimony, that we had a press conference with her --
5 with Freddie Gray's family, who made it clear that
6 their hope was that his funeral would be a day for a
7 solemn remembrance without violence.

8 Q. And that was organized by you and your
9 office?

10 A. Yes.

11 Q. And did you -- were you aware of any other
12 intelligence regarding activities on Monday, other
13 than this purge flyer that was mentioned earlier?

14 A. I was not aware at the time of anything
15 else, nor have I been made aware since that there was
16 any other intelligence of anything other than a
17 protest -- this purge that nobody knew exactly what
18 that meant in the context of high school kids.

19 But that was it, that we knew that some --
20 there was a potential of something happening with
21 high school students on Monday. That's all -- that
22 is the only intelligence that we had at the time.

23 And again, I have not heard of any --
24 subsequent to the unrest, I haven't heard anyone say
25 that there was different intelligence or additional